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U.S. Application No. 10/795,996

<u>REMARKS</u>

The Applicant requests reconsideration of the rejection.

Claims 1-12 remain pending.

Claims 1-12 were again rejected under 35 U.S.C. §103(a) as being unpatentable over Reams, U.S. Patent No. 6,438,660 (Reams) in view of Beukema et al., U.S. Patent Publication No. 2003/0093625 A1 (Beukema). The Applicant again traverses, and incorporates by reference all previous remarks distinguishing these two documents.

In addition, the Applicant responds to the Examiner's Response, set forth on page 6 of the Office Action, by noting that the important distinguishing feature discussed in prior remarks relating to the block nature of the write data, is indeed distinguishable from the prior art, but not in the manner rejected by the Examiner. Although the Examiner rejected this feature as distinguishing because "Applicant has already admitted this feature to be common knowledge and practice within the art" (citing page 1 of the substitute specification filed April 30, 2004), the Applicant does not contend to be the first to write block data. Rather, it is the block nature of the data that is recognized to set up the unique solution set forth in the present specification and claims.

Namely, as recognized by the Examiner, the data stored in the storage device is read in block units, and a security-code computation is performed on the serial data forming a block. By using the computed security code and security code that is added to the block units, an examination is made to determine whether there are no

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errors in the block-unit data. Therefore, data is stored in block units in the storage device, and a security code that is determined by means of a computation similar to that used during reading must be added to the serial data forming each block. According to the present invention, the data control unit reads serial data stored in the storage device to the data storage unit, and computes a security code based on the serial data. Therefore, the data control unit is able to compute the security code for the serial data stored in the data storage unit, according to the order of the storage locations stored in the storage device. Accordingly, even when a data receiver receives a plurality of write data Items in a different order relative to the order of the storage locations in the storage device, the data control unit is able to compute the security code according to the order of the storage locations in the storage device based on the serial data stored in the data storage device. Further, even when the write data received by the data receiver is variable-length data forming only a portion of a block, because data is stored in block units in the data storage unit, the data control unit is able to compute the security code in block units. The data control unit suitably reads serial data of a block constituting a write target from the storage device. Hence, even in cases where the data receiver is unable to receive write data for the same block in series, the data control unit is able to add the security code in block units. The data control unit adds a security code, which is calculated based on serial data stored in a data storage device, to the serial data and then sends this data to the storage device, meaning that block-unit data to which a security code computed according to the storage-location order has been added, is

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continually stored in the storage device. See the substitute specification at page 3, line 18 – page 4, line 15.

As kindly suggested by the Examiner, the section of the specification between page 3, lines 17-29 has been reviewed and the claims have been amended appropriately to better express the features set forth in that passage, which support the uniqueness of the invention as disclosed on page 4, lines 1-15. Accordingly, it is believed that the claims are clearly patentably distinguishable from any motivated combination of Reams and Beukema. Specifically, Reams does not disclose a data control unit for transferring in block units write data to a disk drive or disk array as claimed, and Beukema, cited as teaching the generation of a security code based on stored serial data, does not supply the missing teachings.

The Applicant's representative requests a telephone call at the number below to ensure that the features requested in the Office Action to place the application in condition for allowance have been adequately set forth in the claims.

In view of the foregoing amendments and remarks, the Applicant requests reconsideration of the rejection and allowance of the claims

To the extent necessary, Applicant petitions for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the

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deposit account of Mattingly, Stanger, Malur & Brundidge, P.C., Deposit Account No. 50-1417 (referencing attorney docket no. IIP-5047).

Respectfully submitted,

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